

## REMARKS

In response to the above identified Office Action, Applicants have amended their application and respectfully request reconsideration thereof.

### *Response to Claim Rejections – 35 USC § 102*

Claims 1-5, 7-10, 12 stand rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by U.S. Patent No. 6,477,604 (hereinafter “Chen”). The Applicants respectfully disagree and submit the following arguments in support of their position.

Chen is directed to a module that can receive a notebook computer multi-bay compatible device, and make the multi-bay compatible device useful when not inserted into the notebook computer. A multi-bay compatible device is a device such as a CD-ROM or DVD-ROM that can be inserted into a notebook computer. Because of the limited space on notebook computers, multi bay devices enable the notebook to contain different hardware at different times. Since only one of these devices can be inserted into the notebook computer at a time, for example the CD-ROM device, other devices are unused. Chen thus teaches a stand-alone module into which an unused multi-bay compatible device, such as the DVD-ROM, can be inserted to become a functional DVD player.

In contrast, claim 1 of the present invention requires a memory card interface apparatus comprising a bay to receive a memory card for accessing data stored on the

card, and a separate storage cavity configured to store a memory card. First, the stand-alone module of Chen is not a memory card interface and the multi-bay compatible devices are not memory cards. Hence, Chen appears entirely distinct from the present invention. However, even assuming arguendo that a multi-bay compatible device, such as a CD-ROM device, is somehow analogous to a memory card, Chen nowhere teaches a separate storage cavity of the module configured to store another multi-bay compatible device that the module is not interfacing with.

Therefore, Chen is entirely unrelated to the present invention and neither teaches nor suggests any of the limitations of claim 1. Chen especially does not teach or suggest "a separate storage cavity configured to store a memory card," indeed, the Examiner fails to even direct Applicants attention to any passage in Chen that the Examiner purports would teach or suggest such a limitation. Thus, claim 1 should now be allowed.

Independent claim 8 includes a limitation corresponding substantially to the above-discussed limitations of claim 1. The above remarks are accordingly also applicable to a consideration of claim 8. Accordingly, Applicants requests that the above remarks and amendments contained herein also be considered when examining this other independent claim for allow ability.

As dependent claims are deemed to include all limitation of claims from which they depend, the rejection of claims 2-5, 7, 9-10, and 12 under 35 U.S.C. is 102 also addressed by the above remarks, and the amendments contained herein.

### *Response to Claim Rejections – 35 USC § 103*

Claims 6 and 11 stand rejected under 35 U.S.C. § 103(a), as being allegedly unpatentable over U.S. Patent No. 6,477,604 (hereinafter “Chen”) in view of U.S. Patent No. 6,190,182 (hereinafter “Liebenow”). Claims 6 and 11 depend on allowable independent claims 1 and 8 respectively, adding additional limitations. Liebenow does not teach the limitations of these independent claims, nor does the Examiner assert otherwise. Therefore, these dependent claims are also allowable.

#### SUMMARY

In summary, Applicants believe that all objections and rejections presented in the Office Action have been fully addressed and withdrawal of these objections and rejections is respectfully requested. Applicants furthermore believes that all claims are now in a condition for allowance, which is earnestly solicited.


If there are any additional charges, please charge Deposit Account No. 02-2666.

If a telephone interview would in any way expedite the prosecution of the present application, the Examiner is invited to contact Adam Furst at (408) 947-8200.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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A handwritten signature in black ink, appearing to read 'Adam Furst', is written over a horizontal line.

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